

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**AMAZON.COM, INC and AMAZON
DATA SERVICES, INC.,**

Plaintiffs,

v.

**WDC HOLDINGS LLC d/b/a
NORTHSTAR COMMERCIA
PARTNERS, et al,**

Defendants,

800 HOYT LLC,

Intervening Interpleader Plaintiff,

v.

**BRIAN WATSON, WDC HOLDING
LLC, PLW CAPITAL I,
LLC.AMAZON.COM, INC, and
AMAZON DATA SERVICES, INC.**

Interpleader Defendants.

Case No. 1:20cv484 (RDA/TCB)

**NELSON DEFENDANTS’
UNOPPOSED MOTION FOR
INDEPENDENT APPEARANCE OF
FOREIGN ATTORNEY**

Defendants Carleton Nelson and Cheshire Ventures, LLC (“Nelson Defendants”) respectfully file this Unopposed Motion for Independent Appearance of Foreign Attorney, and, in so doing, respectfully state the following:

1. The Nelson Defendants respectfully request that their *pro ha vice* admitted counsel, Alex Little, be permitted to attend the Friday, March 11, 2022 Motion Hearing (Dkt. 541, 555) without aid of local counsel.

2. Pursuant to Local Rule 83.1(D)(1)(b), local counsel is required to attend all hearings with foreign counsel admitted *pro hac vice*.

3. The Nelson Defendants' local counsel, Rachel Friedman, is in her last week of maternity leave and cannot travel to attend the hearing on Friday. For this reason, the Nelson Defendants' respectfully request that Ms. Friedman be excused from attendance and Mr. Little be granted the limited ability to appear independently of her for the March 11, 2022, Motions Hearing only.

4. No party to the motion objects to Mr. Little's limited independent appearance for the Motions Hearing.

WHEREFORE, for the reasons detailed above, the Nelson Defendants respectfully request that the Court permit counsel Alex Little to attend the March 11, 2022, Motions Hearing independent of local counsel.

Dated: March 9, 2022

BURR & FORMAN LLP

/s/ Rachel Friedman

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/s/ J. Alex Little

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(*pro hac vice*)
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Counsel for the Nelson Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the March 9, 2022, I caused the foregoing document to be electronically filed and served using the CM/ECF System, which will transmit a Notice of Electronic Filing to counsel of record.

Additionally, the document and notification of filing will be sent by U.S. Mail to the following last-known address of the following parties:

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Dated: March 9, 2022

/s/ Rachel Friedman